

From: [REDACTED] [Alan Lambert](#)
To: [AMS - GMO Labeling](#)
Subject: Answers to posted Questions
Date: Sunday, July 16, 2017 7:47:33 PM

1. GMO, genetically modified, gene edited, genetically un-natural
2. Selective breeding within a single species, not interspecies mixing
3. repeated, significant changes in morphology, appearance, or size
4. Yes, any foodstuffs containing genetically modified material should be disclosed
5. all descriptions or terms for genetically modified substances should be replaced by “genetically engineered” or "bioengineered"
6. Any bioengineering of food stuffs should be disclosed (perhaps with percentages) unless it has been shown that the non-dominant ingredient has no effect on performance.
7. Animal products that show different characteristics because of consuming genetically modified feeds should be disclosed. Otherwise, this regulation should not apply
8. Any bioengineered substance should be disclosed unless it has been conclusively proven that it has no effect if ingested.
9. Multiple disclosure categories, specifically defined, would add little to cost, and much to understanding.
10. No exclusions should be necessary.
11. -----
12. The State of Vermont language is appropriate. If manufacturers choose to promote the benefits of bioengineering, then they must describe possible negative effects.
13. All content information should be in one place on the package, and should be large enough for people with 20/25 vision to read easily.
14. Digital links must NEVER be permitted to substitute for required readable text as defined here. This assumes nothing has been left out of text requirements.
15. QR codes should only be permitted as additional information, not as basic disclosure.
16. Where possible (fish, for example, or fruit) non-polluting stickers could work. For bulk food (grain—salt etc) the large container should carry text no smaller than ½” high
17. -----
18. 3/8” color stick ons could be defined by AMS, and required (along with easily seen signs describing the meaning of each color)
19. No company size should be exempted from disclosures (too easy to cheat), but appropriate smaller companies could be permitted to act as in #18
20. -----
21. Disclosures could be on menus, or posted signs pursuant to requirements above
22. very small manufacturers should still provide disclosure, but the disclosure requirements as above should be minimized to be VERY easy to follow.
23. At no point should a consumer be required to do anything more than read to have all bioengineering information available. If manufacturers want to go beyond the requirement, they should be allowed to do it in whatever manner they choose as long as they do not try to supercede the written disclosures.
24. Again, requiring consumers to take any action not usually available to 100% of consumers to get GMO information is wrong. This proviso can be changed when and if 85% of consumers regularly use scanners to obtain their information.
25. AMS must stop pandering to the desires of manufacturers. If not, then we must stop requiring ANY nutritional information to be shown on anything. AMS can include a proviso than when #24 above is attained, then the means of providing genetic

engineering info can be revisited.

26. The answer is NONE---random inspections, and provision for “tattletaling” should be sufficient, and less costly.
27. Submission of a picture, definable location, and date, and the identity of the complainant and the non-compliant company should be sufficient for AMS to initiate, or request, an unannounced investigatory visit to confirm the information. If confirmed, then an announced and sufficiently staffed investigation could be instituted prior to legal action.
28. -----
29. Social contact programs together with normally published hearing summaries.
30. Customs should be empowered to enforce in the same as they already do.

Cordially,

Alan Lambert